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By Hand

The Honorable Harold Baer, Jr.
United States District Judge
United States Courthouse
500 Pearl Street, Room 2230
New York, New York 10007

RECEIVED
MAY 16 2008
HAROLD BAER
U.S. DISTRICT JUDGE
S.D.N.Y.

Diario El Pais, S.L. and Prisacom, S.A. v. The Nielsen Company (US), Inc.
07 CV 11295 (HB)

Dear Judge Baer:

In accordance with the Pretrial Scheduling Order in this action, defendant The Nielsen Company (US), Inc. ("Nielsen") is filing and serving today reply papers in support of its motion under Fed. R. Civ. P. 12(b)(6) to dismiss plaintiffs' amended complaint with prejudice. Pursuant to Paragraphs 4(A)(i) and 4(B) of Your Honor's Individual Practices, enclosed herein is one complete copy set each of (a) Nielsen's reply papers and (b) plaintiffs' papers filed in opposition to the motion.

We note that while we are serving plaintiffs' counsel today with the same unredacted versions of these reply papers as are included with this letter, given the previous request of plaintiffs and pursuant to both Paragraph 17 of the Stipulated Protective Order in this action as well as Your Honor's April 22 endorsement of a similar request, we are currently filing only a redacted version of the reply brief, with all discussions of the sealed Annex 1 to plaintiffs' amended complaint removed, in the Court's public ECF system. Thus, in accordance with plaintiffs' request, Paragraph 17 of the Stipulated Protective Order, and the April 22 endorsement, we hereby respectfully

request permission from Your Honor to file the unredacted version of Nielsen's reply brief under seal.

Respectfully submitted,

Leslie Gordon Fagen

Leslie Gordon Fagen

Enclosures

cc: William O. Purcell, Esq. (via e-mail and hand)

This court's request to me & I used to file the unredacted version of Nielsen's reply brief under seal - O's have been done in hand - in letter -

ORDERED:

Harold Baer, Jr.
Harold Baer, Jr., U.S.D.J.

Date: 5/22/08

Endorsement:

This sounds right to me and I will grant your application to file the unredacted version of Nielsen's reply under seal - a short form order would have done as well - or better.